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October 27, 2005

Via ECFS

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: Oral Ex Parte Presentation in ET Docket No. 03-137

Dear Ms. Dortch:

This is to report that yesterday, Paul Guckian, John Forrester, and I of QUALCOMM and Raymond Octaviano and Barry Pate of Lenovo International met with the following members of the staff of the Office of Engineering and Technology: Bruce Franca, Bruce Romano, Alan Stillwell, and Robert Cleveland. In addition, the following members of the staff of the FCC's Laboratory participated in the meeting by video conference: Rashmi Doshi, Bill Hurst, Tim Harrington, and Kwok Chan. Attached is a copy of the presentation given at the meeting by QUALCOMM. Lenovo's presentation included confidential material, and, therefore, a version of the presentation without the confidential material accompanies this filing. Lenovo has filed a request for confidential treatment of the full presentation, pursuant to Section 0.459 of the Commission's rules. In accordance with Section 0.459 (e), we request that the confidential materials be returned to it in the event that the Commission denies the request for to withhold the materials from public inspection.

The presentations focused on the impending proliferation of laptop models with embedded modules containing wide area wireless 3G technologies (such as 1xEV-DO or WCDMA/HSDPA), and two related proposals for changes in Commission procedures to facilitate the rapid rollout of these products while ensuring that the public's health and safety is fully protected. The first proposal is QUALCOMM's proposal that the Commission change its rules to exempt laptops containing modules that operate at 500 mW or less at a separation distance of 10 cm or more from having to undergo SAR testing. In the attached presentation, QUALCOMM shows again that the data in the OET database of granted equipment authorizations fully supports this proposal.

The second proposal that we discussed is for an interim procedure that the Office of Engineering & Technology could adopt now under its informal

procedures governing SAR testing, without having to change any Commission rule. QUALCOMM and Lenovo proposed that if a laptop vendor performs and files SAR testing for three laptop models containing a particular wide area wireless module with an antenna subsystem that meets the peak gain listed in the authorization for the module and the results demonstrate compliance with the Commission's SAR rules, then the vendor should be able to extend the authorization to other notebook host platforms without the need for further SAR testing. OET already has a similar 3-host procedure in place for PCMCIA cards. We asked for an expeditious ruling on this proposal given the impending surge of laptop models from Lenovo and other laptop vendors containing these embedded modules with the 3G wide area wireless technologies soon to come to market.

Respectfully submitted,

/s/ Dean R. Brenner

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Cc: Bruce Franca
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